

U.S. DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

AUG 14 2020

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

FILED

UNITED STATES OF AMERICA

v.

DANIEL E. MUSSO

Docket No.: 1:16-CR-33-JL

DEFENDANT'S THIRD PROPOSED EXHIBIT LIST

Defendant Daniel E. Musso, by his attorneys, respectfully submits the within Exhibit List.

The Defendant expects to present the following exhibits at trial:

A Series:		Government Documents concerning Milton Abrams	
A-1		CHS Admonishments 02/27/12	01826-01827
A-2		CHS Admonishments 02/28/13	01828-01829
A-3		CHS Admonishments signed by M. Abrams (2013)	01847-01851
A-4		CHS Admonishments 03/17/14	01830-01831
A-5		CHS Admonishments 03/13/15	01832-01833;
A-6		CHS Admonishments signed by M. Abrams (2015)	01842-01846
A-7	(ID)	Revocation 12/11/15	01852-01853
A-8		CHS Admonishments 03/07/16	01834-01835
A-9		CHS Admonishments 03/09/17	01836-01837
A-10		CHS Admonishments 02/22/18	01838-01839
A-11		CHS Admonishments 03/05/19	01840-01841
A-12	(ID)	Firearms Inspection Report 2015	01703-01711
A-13	(ID)	ATF Warning Letter 10/20/15	01712-01713
B Series:		Other documents reflecting FBI relationship with Milton Abrams and payments made to him	
B-1		Giglio Disclosure letter re: payments to Abrams 12/08/17	
B-2		FBI Payment Request/Receipts 01-02/2013 (\$400.00)	01867-01869
B-3		FBI Payment Request/Receipts 02/2013 (\$300.00)	01873-01879
B-4		FBI Payment Request/Receipts 04/2013 (\$400.00)	01884-01886
B-5		FBI Payment Request/Receipts 07/2013 (\$300.00)	01793-01796; 01902-01904
B-6		FBI Payment Request/Receipts 08/2013 (\$800.00)	01911-01914

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8/10

8/10	B-7	(ID)	FBI Payment Request/Receipt 03/2015 (\$5,000.00)	01938-01939; 01942
8/10	B-8	(ID)	FBI Payment Request/Receipt 01/2016 (\$5,000.00)	01944-01946
	B-9	(ID)	Email string re: CHS 04/07/15 – 4/30/15	01859-01866
8/11	B-10	(ID)	FBI Field Office Annual Source Report	01825
	C Series:		Milton Abrams-FBI communications	
	C-1	(ID)	Text messages from CHS phone 08/14/15 – 04/20/17	00935-00938
	C-2	(ID)	FBI report (11/15/16) re: David Musso visit to Charlie Company Army Navy on 10/14/16	01289-01290
	D Series:		Documents signed by Defendant following the 01/27/16 arrest	
	D-1		Advice of Rights 01/27/16	00327
	D-2		Consent to Search 71 Main Street (upstairs), East Kingston, NH 01/27/16	00328
	D-3		Consent to Search 149 Crawley Falls Road, Brentwood, NH 01/27/16	00329
	D-4	(ID)	Consent to Search 2006 Toyota Scion 01/27/16	00330
	D-5		Consent to Search Apple MacBook Pro 01/27/16	00331
	D-6		Consent to Search Samsung cell phone 01/27/16	00332
	E Series:		Photographs	
	E-1		Photo of 149 Crawley Falls Road, Brentwood	00434
	E-2		Photo of 149 Crawley Falls Road, Brentwood	00437
	E-3		Photo of 149 Crawley Falls Road, Brentwood	00442
	E-4		Photo of 149 Crawley Falls Road, Brentwood	00451
	E-5		Photo of 149 Crawley Falls Road, Brentwood	00452
	E-6		Photo of 149 Crawley Falls Road, Brentwood	00453
	E-7		Photo of 149 Crawley Falls Road, Brentwood	00530
	E-8		Photo of 149 Crawley Falls Road, Brentwood	00537
	E-9		Photo of 71 Main Street, East Kingston	
	E-10		Photo of 71 Main Street, East Kingston	
	E-11		Photo of 71 Main Street, East Kingston	
	E-12		Photo of 71 Main Street, East Kingston	
	E-13		Photo of 71 Main Street, East Kingston	
	E-14		Photo of 71 Main Street, East Kingston	
	E-15		Photo of 71 Main Street, East Kingston	
	E-16		Photo of 71 Main Street, East Kingston	
	E-17		Photo of 71 Main Street, East Kingston	

F Series:		Chain of Custody-related documents	
F-1		FBI Explosives Unit Ammunition Support Request 11/03/15	02474
F-2		Issue Release/Receipt Document 11/03/15	02475
F-3		FBI Laboratory Substitution Transaction Record 11/04/15	02501
F-4		FBI document regarding grenades chain of custody 01/27/16-01/23/20	02837-02837.02
F-5		FBI search/chain of custody documents 01/27/16 – 02/04/16	00790-00807
8/10 F-6	(ID)	FBI Evidence Chain of Custody documents – grenade 01/27/16	00932-00934
F-7	(ID)	FBI Laboratory Report by McCrady in Explosives Unit 12/05/17	01467-01472
F-8		FBI Report re: grenade transport 01/09/18	01721
F-9		FBI Report re: grenade transport 03/22/18	01824
F-10		FBI Report attaching Declaration of Brian P. LeBlanc 02/08/18	01722-01727
F-11		FBI Laboratory Evidence Submitted Receipt 03/17/19	02866
F-12		FBI Laboratory Evidence Return Receipt 03/23/19	02866.02
G Series:		Recordings and Transcripts	
G-1	(ID)	Video (full) – Defendant and CHS meet 01/15/16	
G-2	(ID)	Transcript of Audio – CHS Meeting 01/15/16	
G-3	(ID)	Transcript of Audio – CHS Meeting – Slightly Different 01/15/16	
G-4		Video (full) - Aerial Surveillance 01/27/16	
8/12 G-5		Video (partial) – Aerial Surveillance 01/27/16	
G-6	(ID)	Video - Seabrook Rest Area Footage 08/06/20	
H Series:		Defendant Medical Records	
H-1		Daniel Musso's Medical Records – Professional Audiology Center (2013)	
H-2	(ID)	Daniel Musso's Medical Records – Strafford County House of Corrections	
I Series:		Miscellaneous	
I-1	(ID)	Criminal Complaint and Agent P. Christiana Affidavit 01/27/16	00258-00265
I-2	(ID)	Handwritten Notes	00105-00108
8/10 I-3	(ID)	Charlie Company Order Form 11/07/15	

I-4	(ID)	Wildlife Control Operator License Issued to Daniel Musso 6/5/20	
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Defendant reserves the right to amend this list of exhibits upon notice to the parties.

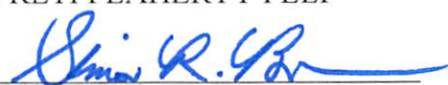
Respectfully submitted,

DANIEL E. MUSSO

By his attorneys,

PRETI FLAHERTY PLLP

Date: August 12, 2020

By: 
Simon R. Brown, NH Bar #9279
P.O. Box 1318
Concord, NH 03302-1318
(603) 410-1555
sbrown@preti.com

CERTIFICATE OF SERVICE

I hereby certify this 12th day of August 2020 copies of the foregoing *Exhibit List* have been forwarded to all parties of record electronically via email.


Simon R. Brown, NH Bar #9279